

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: ALLERGAN BIOCELL TEXTURED
BREAST IMPLANT PRODUCTS LIABILITY
LITIGATION

KAREN HASENSTAB

Plaintiff

No. 2:19-md-02921 (BRM)(LDW)

MDL NO. 2921

Honorable Brian R. Martinotti
District Court Judge

Honorable Leda D. Wettre
Magistrate Judge

MASTER SHORT-FORM COMPLAINT
FOR PERSONAL INJURIES, DAMAGES
AND DEMAND FOR JURY TRIAL

1. Plaintiff Karen Hasenstab hereby states and incorporates by reference all of the allegations contained in Plaintiffs' Master Long Form Complaint for Personal injuries, Damages and Demand for Jury Trial ("Master Complaint") as permitted by Case Management Order No. 17 for cases filed directly into this district.

2. In addition to the below-indicated portions of the Master Complaint adopted by the plaintiff and incorporated by reference herein, Plaintiff hereby alleges as follows:

IDENTIFICATION OF PLAINTIFFS AND RELATED INTERESTED PARTIES

3. Name and current residence of individual who is alleged to have suffered personal injuries and related damages due to implantation of one or more Biocell Textured Breast Implant medical devices ("Biocell"):

Karen Hasenstab
4240 Lost Hills Road #405
Calabasas CA 91301

4. Consortium Claim(s): Name and current residence of individual(s) alleging damages for loss of consortium:

Not applicable.

5. If a survival and/or wrongful death claim is asserted:

Name and residence of Decedent when she suffered Biocell-related injuries and/or death:

Name and current residence of the individual(s) bringing the claims on behalf of the decedent's estate, and status (i.e., personal representative, administrator, next of kin, successor in interest, etc.):

VENUE

6. Plaintiffs allege that venue for remand and trial is proper in the following federal judicial district:

United States District Court for the Central District of California

DEVICE IDENTIFICATION

7. Plaintiff used the following Biocell device[s], which Plaintiff contends caused her injuries. Check all that apply and provide all dates of implant and explant:

NATRELLE Silicone-filled Breast Implants Style 110 Style 115 Style 120 Date[s] of Implant: Date[s] of Explant (if any):	NATRELLE Saline-Filled Breast Implants Style 163 Style 168 Style 363 Style 468 Date[s] of Implant: Date[s] of Explant (if any):
<input checked="" type="checkbox"/> NATRELLE 410 Highly Cohesive Anatomically Shaped Silicone-Filled Breast Implants Style LL Style LM Style LF Style LX Style ML Style MM Style MF Style MX Style FL Style FM <input checked="" type="checkbox"/> Style FF Style FX Date[s] of Implant: May 8, 2015 Date[s] of Explant (if any): April 1, 2021	NATRELLE INSPIRA Silicone-Filled Breast Implants Style TRL Style TRLP Style TRM Style TRF Style TRX Style TSL Style TSLP Style TSM Style TSF Style TSX Style TCL Style TCLP Style TCM Style TCF Style TCX Date[s] of Implant: Date[s] of Explant (if any):
McGhan BioDIMENSIONAL® Silicone-Filled BIOCELL® Textured Breast Implants, Style 153	NATRELLE Dual-Gel Breast Implants Style LX Style MX

Date[s] of Implant: Date[s] of Explant (if any):	Style FX Date[s] of Implant: Date[s] of Explant (if any):
NATRELLE Komuro Breast Implants Style KML Style KMM Style KLL Style RLM Date[s] of Implant: Date[s] of Explant (if any):	NATRELLE Ritz Princess Breast Implants Style RML Style RMM Style RFL Style RFM Date[s] of Implant: Date[s] of Explant (if any):
NATRELLE 150 Full Height and Short Height double lumen implants. Date[s] of Implant: Date[s] of Explant (if any):	NATRELLE 133 Plus Tissue Expander Date[s] of Implant: Date[s] of Explant (if any):
NATRELLE 133 Tissue Expander with Suture Tabs Date[s] of Implant: Date[s] of Explant (if any):	OTHER (Please describe): Date[s] of Implant: Date[s] of Explant (if any):

PLAINTIFF'S BIOCELL-RELATED INJURIES

8. Plaintiff alleges that one or more Biocell devices caused personal injuries and damages including but not limited to the following: significantly increased risk of developing cancer, emotional distress including fear and anxiety of developing cancer, accumulation of foreign and adulterated silicone particles in their bodies, including the resulting inflammation, cellular

damage, and subcellular damage, past and future medical expenses, physical pain and suffering from explantation, scarring and disfigurement.

9. Approximate date of Biocell-device related injury:

Plaintiff believes she started having physical symptoms from the implants sometime around the middle of 2020. Plaintiff learned of the product recall due to the increased risk of ALCL sometime in late 2019 or early 2020.

10. Has Plaintiff or Plaintiff's decedent ever been diagnosed with BIA-ALCL:

Yes

No

If Yes, date of diagnosis:

CAUSES OF ACTION

11. The following claims asserted in the *Master Complaint* are herein adopted by Plaintiff:

- Count I: Strict Liability – Manufacturing Defect
- Count II: Negligent Manufacturing
- Count III: General Negligence
- Count IV: Strict Liability Failure to Warn
- Count V: Negligent Failure to Warn
- Count VI: Negligent Misrepresentation
- Count VII: Breach of Implied Warranty of Merchantability
- Count VIII: Breach of Express Warranty
- Count IX: Strict Liability Design Defect

Count X: Negligent Design

Count XI: Survivorship and Wrongful Death

Count XII: Loss of Consortium

Count XIII: Punitive Damages

Other Claims and factual basis therefore:

OTHER DEFENDANTS

12. Plaintiffs further bring claims against the following additional Defendants not named in the *Master Complaint*.

Additional Defendant(s):
Additional Defendant 1: _____

Additional Defendant 2: _____

Additional Defendant 3: _____

Additional Defendant 4: _____

Address(es) of Additional Defendants:
Address of Defendant 1: _____
Address of Defendant 2: _____
Address of Defendant 3: _____
Address of Defendant 4: _____

Short and Plain Statement of Factual Allegations against Additional Defendant:

Claims asserted against Additional Defendants:

WHEREFORE, Plaintiffs pray for relief and demand a trial by jury as set forth in the Plaintiffs' Master Personal Injury Long Form Complaint in MDL 2921 in the United States District Court for the District of New Jersey.

Date: December 31, 2025.

/s/ J. Scott Humphrey
J. SCOTT HUMPHREY

J. Scott Humphrey (CA Bar No. 150476)
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Robert G. Germany, hereby certify that I have day served a true and correct copy of the above and foregoing pleading via PACER on all counsel having appeared in this case.

DATED, this the first day of January, 2026.

/s/ J. Scott Humphrey _____
J. SCOTT HUMPHREY